

Battaglia, Frank

From: Battaglia, Frank
Sent: Tuesday, July 09, 2019 7:07 PM
To: Joseph F Guarnaccia; Jeffrey P. Crawford (jeff.crawford@dem.ri.gov)
Cc: Cote, Glen; Koenigsberg, Stephen; Battaglia, Frank
Subject: RE: Cranston site
Attachments: Cover letter ISCO RCRA 061019.pdf

Joe, as we discussed early last week, the EPA Land, Chemicals and Redevelopment Division and the RIDEM Office of Waste Management have reviewed the attached modified ISCO proposal dated June 10, 2019 and are in agreement that BASF may proceed with implementing the proposed modification (i.e., replacing Ozone in favor of Potassium Persulfate) at the former Ciba-Geigy facility located at 180 Mill Street in Cranston, RI. Please keep me updated on the status of the bench testing, well installation, aquifer profile study and schedule for completion.

Sincerely,

Frank Battaglia
617 918-1362

From: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>
Sent: Tuesday, June 11, 2019 12:31 PM
To: Battaglia, Frank <battaglia.frank@epa.gov>; Jeffrey P. Crawford (jeff.crawford@dem.ri.gov) <jeff.crawford@dem.ri.gov>
Cc: Cote, Glen <gcote@cecinc.com>; Koenigsberg, Stephen <skoenigsberg@cecinc.com>
Subject: RE: Cranston site

Frank and Jeff,
Please find attached a proposal for proceeding with the ISCO work.

Regards
Joseph Guarnaccia
EHS Remediation Specialist

Mobile: +1-732-762-4743, Fax: +1 732 914-2906, Email: joseph.guarnaccia@basf.com
Postal Address: BASF Corporation, , 227 Oak Ridge Parkway, 08754 TOMS RIVER, United States


We create chemistry

From: Joseph F Guarnaccia
Sent: Monday, June 3, 2019 9:00 AM
To: Battaglia, Frank <battaglia.frank@epa.gov>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Rick Kowalski <rkowalski@aeiconsultants.com>; Cote, Glen <gcote@cecinc.com>
Subject: RE: Cranston site



SEMS DocID

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Frank

Here is an update:

Soil cover: you will receive a submittal today. I hope that the details provided will be sufficient, however, if EPA requests a meeting then we will accommodate.

ISCO: BASF is implementing several parallel tasks:

- Coordinate w/ Narragansett Electric for ozone electrical hookup.
- Conduct a profile study to define the ISCO application area. Specifically, the initial goal of the ISCO is to eliminate discharge of impacted groundwater to the river (i.e., the system will cut off discharge of GW in excess of applicable regulatory standards, and as such, it will be the functional equivalent to a GW P&T, where the treatment is in-situ). Given the heterogeneity of the geology, it is necessary to apply the ISCO along specific GW transport pathways where mass flux is significant (thus the profile study). Once flux control is achieved, the system will be expanded as necessary to address potential upgradient source mass with the goal of minimizing the term of necessary flux control.
- As I discussed with you on the phone, BASF is investigating an alternative, passive, ISCO application, where many wells are installed in an array, and in each well is placed a constant application of an oxidant (solid or liquid) capable of destroying all Site COCs. A memo detailing this concept will be provided this week. The reasons for this change in scope relate to feasibility:
 - o Related to Site location (relatively remote)
 - Ozone is O&M intensive with many moving parts.
 - Ozone has significant above ground infrastructure (building, electrical). This is a potential issue with trespassing/vandalism.
 - o An application of constant passive release oxidant has the advantages of low O&M (periodically renew well functionality and oxidant source) and no significant above ground infrastructure (flush mounted wells).

Regards

Joseph Guarnaccia

EHS Remediation Specialist

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We create chemistry

From: Battaglia, Frank <battaglia.frank@epa.gov>

Sent: Monday, June 3, 2019 7:24 AM

To: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Battaglia, Frank <battaglia.frank@epa.gov>

Subject: Cranston site

Joe, what's the plan for groundwater at the site? I need to update my management and RIDEM.

Also, do we need to get together to discuss the changes to the soil cover or will there be an update to the May 13th submittal coming soon? Please advise.

Frank Battaglia

